

October 2, 2013

Ms. Heidi T. Merkel, AICP,
Senior Planner, Fairfax County Department of Planning & Zoning
Department of Planning & Zoning
Planning Division, Suite 730
10255 Government Center Parkway
Fairfax, VA 22035-5505

RE: RA Comments to Version 8 (9-30-13) of the DRAFT Comprehensive Plan Text for the Reston Transit Station Areas.

Dear Ms. Merkel:

The following comments arise from a consensus within the Reston Association (RA) that some of the principles which should guide the Reston Phase One master planning process are not evident in the Version 8 draft Plan text. Although the Plan text improves with each subsequent version, there is a widely held concern that the following six significant issues have not been adequately addressed, so far, in the draft Plan text. Beneath each of the six issues, we list specific edits that we think should be made to the Version 8 draft Plan text.

1. **Sustaining Reston:** We believe that Reston is one integrated community that includes all of the land within the Transit Station Areas. It is not two communities separated by the DAAR corridor. In order to integrate new development into the fabric of Reston, all new development should be incorporated into either RA or Reston Town Center Association (RTCA), according to their agreed upon membership boundaries.
 - a. The following sentence, taken from the Reston Association's "Welcome to Reston" publication, should be inserted after the second sentence under **PLANNING HISTORY, page 6**, where the history and principles of Reston are summarized. "The sustainable design of the community lends itself to the preservation of parkland, natural areas, clean lakes and walking trails."
 - b. The second paragraph on **page 8** should clearly state that all new development should be incorporated into either RA or RTCA, according to their agreed upon membership boundaries. The word "consider" should be stricken from the phrase "consider including" (**page 8**). The section on **Urban Parks, Recreation Facilities and Cultural Facilities (pages 86-89)** contains other appropriate locations to restate and reinforce the benefits of all new development into the fabric of Reston, by incorporation into RA or RTCA. The text of the first bullet point -- **provide urban parks and other recreational amenities throughout the transit station areas** is strongly supported, and the reference to RA membership there and on **page 91** is strongly supported. The reference to Reston's DRB (**page 33**) is appreciated and strongly supported.
 - c. None of the Phase II area should be re-planned in Phase I (directly or indirectly). The Phase II area must be considered independently, without any predetermined increased redevelopment intensity arising from Transit Oriented Development (TOD) designation "circles" established in the Phase I effort. The ¼ and ½ mile TOD circles are important concepts, but serve no useful purpose when shown on Plan maps. We support removal of such circles from all the maps, including **page 3, Transit Stations Locator Map and page 90, Parks, Recreation and Culture**.
 - d. To further clarify that no new increased development is envisioned south of Sunrise Valley Drive, except in the Reston-Herndon Suburban Center Sub-unit E-2, the phrase "*planned development north of Sunrise Valley Drive*" should end the last sentence of the Sunrise Valley Corridor bullet point under **Linear Parks, p. 88**.

2. **Environmental Sustainability:** Consistent with Reston's history of forward thinking on environmental stewardship and sustainability, we believe that future development in Reston should meet the highest feasible environmental standards, ranging from the protection or restoration of natural amenities, to the use of the best environmental practices in development design and materials.
- a. The section on **Stormwater Management** should be carefully worded so as to not conflict with the new regulations, to be adopted before July 2014. Language concerning specific stormwater management measures (**pages 77-78**) should be kept to a minimum since this is a thirty year document, which will need to be flexible to remain current with new technologies and new regulations. A sentence should be added to page 76 identifying that RA and the County coordinate in the review of new stormwater management systems. This sentence is consistent with the role of RA identified on **page 78**.
 - b. Preserving and protecting the natural environment is a key unifying feature of Reston. Reston Association (RA) maintains a list of "banned" plants and "preferred" native plantings, which should be followed in all future development. A specific reference to these lists should be included under **Environmental Enhancement (p. 79)**, as well as on **page 39 (Planting in the Pedestrian Realm)**, **page 48 (Reston-specific streetscape)**, **page 75 (Environmental Stewardship)** and **page 80 (Tree Canopy goals)**.
 - c. The term "passive, non-programmed, common open space" should be considered in replacement of the term "common greens" in the **Parkland (local)** section of **Table 2 (p.85)**.
 - d. The term "mature tree canopy" rather than merely "tree canopy" should be used on **page 11, Planning Principle number 2**, and in the **Environmental Stewardship (page 75)** and **Tree Canopy Goals (page 79)** Sections, in order to reinforce the preservation and protection of existing, mature trees within the Transit Station Areas (TSA). The reference to "mature" trees on **page 48** is supported.
 - e. Fish and aquatic plants should be added as an important feature of **Lakes and Ponds, page 79**. In Reston, all water bodies are viewed as much more than just storm water ponds. Coordination of future development with RA should also be added to the **Lakes and Ponds** section. The RA is responsible for preserving both aquatic life and the continued stormwater management function of existing ponds/lakes. A reference to the "educational value" of water bodies in Reston should be added to the **Stormwater Parks** bullet point under **Linear Parks, page 89**.
 - f. The existing wetlands bank along Sunrise Valley Drive in the **Herndon Station District** is an important resource. The term "publicly accessible" should be included in the description of the **Herndon Station District, page 19**. References to "public access", as well as, "educational and passive recreational uses" of this wetland should also be added to the last sentence of **Wetlands, page 78**. In addition, a statement should be added to the text on **page 78** and in **Tree Canopy Goals (pages 79-80)**, encouraging wetlands and contiguous forest areas to be owned in fee simple or easement, by an agency/organization, such as RA, that would ensure perpetual stewardship and public access.
 - g. Context sensitive road design and preserving natural vegetation for road buffers should be emphasized in the **Urban Design Plan** text in order to lessen visual and environmental impact (**pages 36-37**).
3. **Flexibility:** We appreciate the need for moderate flexibility in planning over a two-decade timeframe, but we do not support Plan language that would allow significant variation or increase from the density/intensity and land use mix objectives laid out in the Preferred Development Scenario (Scenario G).
- a. Maintaining a lower intensity of uses in that portion of the Reston Town Center Station TOD district, which is south of the Toll Road, is important to the preservation of nearby stable residential and open space areas. Staff's proposed text on **pages 19 and 110** is strongly supported.
 - b. We support the Plan text, which states that the jobs to households ratio objective is merely an overall planning metric, which was used to ascertain the target development level (number of jobs and households) in the Task Force's Preferred Development Scenario and in the Plan. The Plan Text should be amended on **page 23** to clearly state that this ratio is not to be used to justify an increase in development intensities/densities above those contained in the "District Recommendations." We believe that the jobs to households ratio used in the Plan Text should mirror the "buckets" of maximum development intensity/density and the mix of uses reflected in both the Task Force's Preferred Development Scenario and the Plan's **District Recommendations**.

- c. The **District Recommendations** are based on a total of approximately 30 million gross square feet of office space within the Reston-Herndon suburban center sub-units (the "Corridor"). This maximum amount of office space corresponds to the office development level proposed in Development Scenario G, updated 11-27-12 (hereinafter the "Preferred Development Scenario"). This Preferred Development Scenario envisions 37,265,559 gross square feet of total commercial space within the corridor (office, retail, hotel, etc.) and 114,936 jobs. The Preferred Development Scenario and the draft Plan text also allow the number of households (dwellings) within the corridor (not including the areas of Reston outside the corridor) to increase from 5,860 dwellings (in 2010) to 27,932 (rounded to 28,000) in thirty years. This level of development should be consistently stated in the Plan as "maximums" (**page 23, 2nd full paragraph, line 6**). The term "target" should be avoided altogether (**page 23, 2nd full paragraph, lines 1 and 7**).
 - d. The 0.5 FAR "bonus" development intensity (**pages 30-31**) should be allowed only within ¼ mile of a Metro Station platform. Furthermore, achieving a minimum of only two "additional development objectives" to warrant this "bonus" is too low a threshold. Unless the draft Plan text is changed, the Preferred Development Scenario will easily be exceeded, resulting in an imbalance between land use and the transportation infrastructure.
 - e. In the new Planned Development Commercial (PDC) and Planned Residential Mixed Use (PRM) zonings, substantial conformance to the type, character, intensity, and density recommended in the Comprehensive Plan is a zoning ordinance requirement rather than merely a guideline. See, Section 16-101.1 of the Zoning Ordinance. Therefore, in order to enforce a maximum height requirement, it must be in the Plan text. Why are there no building height limitations in the draft Plan Text (**page 60**)? Specific maximum heights, especially outside the TODs, are an important urban design tool that helps ensure that development "fits in" to existing neighborhoods.
4. **Open Spaces, Parks, & Recreation:** In order to sustain Reston's existing character and reputation as a model planned community, we believe the new Comprehensive Plan must assure the provision of adequate high-quality, publicly accessible open space, parks, natural areas, and recreational facilities within the Phase 1 area, to accommodate Reston's residents and employees.
 - a. An additional Fairfax County Reston Community Recreation Center should be listed in the ninth **Reston vision statement** bullet, **page 13**.
 5. **Mobility:** We believe the people of Reston must have reasonable cross-community driving, biking and walking conditions, especially during peak periods, both within and near the Phase 1 area. The Transportation Study states that Metro will accommodate less than 10 percent of commuting trips. Therefore, the following are crucial to maintain a balance between land use and transportation: (1) Road, bicycle, pedestrian and bus transit improvements; (2) transportation demand management (TDM) measures; and (3) adherence to the Preferred Development Scenario's mix of uses and maximum level of development cap.
 - a. The Plan text, on **page 12, bullet 8**, should clearly state that additional north-south multi-modal mobility should be provided across the DAAR.
 - b. The priority list of **Road Transportation Improvements (pages 71)** is supported; however, why aren't the 15 intersection improvements relied on in the Transportation Study listed? VDOT's review of the Fairfax County Transportation Study states "monitoring and phasing of future development as the transit-oriented development (TOD) areas and surrounding areas develop is essential to assure an ongoing balance between transportation services and travel demand." Therefore, the Plan text should state that these are all necessary to balance transportation with the level and mix of land uses in the District Recommendations. The text on **page 63** should be clear that transportation improvements should be provided at the same time new development occurs.
 - c. The Traffic Impact Analysis (TIA) analyzed significantly less development than is allowed by the Preferred Development Scenario – 3,373 less dwellings and 2,076,143 less commercial gross floor area. We are extremely concerned that this undercounting will result in a misrepresentation of the traffic impacts to the Reston road network from the level of development allowed by the Plan text. It is likely that more than 80% of the allowed level of development will be built. If so, at what level will the local road network perform? This 80 percent undercounting is exacerbated by the fact that the Preferred Development Scenario does not count: (i) additional bonus residential densities allowed in the Plan (affordable and workforce housing); (ii) additional redevelopment within the corridor but outside the TODs; (iii) additional redevelopment which may arise in

village centers from the Phase II Plan amendment; (iv) the 1/4 bonus intensity for institutional, ground floor retail and hotel uses (**page 28**); or, (v) the 0.5 FAR bonus within a TOD district (**page 31**). These five uncounted "bonus" developments will surely result in many more vehicle trips than were assumed in the TIA.

- d. The Plan text on **page 69** should state a goal of maintaining an overall LOS "E" on the road network within the Transit Station Areas. The Plan text should also explain how this "overall" rating is calculated. Is it an average? We share VDOT's concern that most of the individual intersection ratings contained in the TIA seem to be worse than LOS "E." If so, how can an overall goal of LOS "E" be met? This concern was raised by VDOT on page 6 of its review of the County's Transportation Study.
 - e. **Page 68** discusses a modification of current Fairfax Connector Bus routes to feed the Metro stations. This section should be expanded to discuss the need to provide a reliable, convenient and frequent urban bus service connecting all of Reston – not just the feeder service to Metro. Expanded local service must be provided, not just a modification of Metro feeder routes.
 - f. The Plan text, on **page 39**, which discusses pedestrian and bicycle crossings should also mention that "At major roadway intersections closest to Metrorail stations, grade separated crossings offer the safest and most congestion-reducing way to accommodate the large number of pedestrians and bicyclists accessing Metrorail."
6. **Implementation:** We believe the people of Reston must have strong guarantees that the infrastructure needed to support the increased level of development and continue Reston's high quality of life, will be completed concurrently with development, and is paid for, on a fair, pro rata basis, by those who will profit from the development.
- a. The text of the ***Phasing to Transportation Improvements*** and ***Programs and Phasing to Public Facilities*** sections (**pages 32, 94-95**) need to more clearly state this principle. The Plan text should clearly state that infrastructure identified as necessary to support specific redevelopment should be put in place before or concurrently with such development.
 - b. In some locations, the reduced parking required or allowed for uses within the TODs will likely result in parking encroachment into existing, stable neighborhoods. This issue should be addressed in the Plan text on **page 35, Respect Surrounding Neighborhoods**.

On Behalf of the Board of Directors of Reston Association,



Ken Knueven
President

cc: The Hon. Catherine M. Hudgins, Hunter Mill District Rep., Fairfax County Board of Supervisors
The Hon. Frank A. de le Fe, Vice Chair, Fairfax County Planning Commission
Ms. Patty Nicoson, Chair, Reston Master Plan Special Study Task Force
Paul J. Kraucunas, P.E., VDOT
Reston Association Board of Directors
Reston Citizens Association Board of Directors
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